

SPECIFIC COMMENTS

The following specific issue points were compiled by Harry Gibson, Principal Planner, City of West Sacramento, Community Development Department, 1951 South River Road, West Sacramento, California 95691 (916) 373-5854.

EIS/EIR DOCUMENT:

1. Page 1-4. The State Lands Commission should be included as a participant in the process since it has stewardship responsibility for lands below the ordinary high water line.
2. Page 1-7. The goal of improving export water supply is listed above the goal of meeting outflow needs. It is not clear in the text whether the goals are listed in order of priority or if all goals have equal weight. In the City's view, the priority of meeting outflow and water quality needs should be equal or greater than the priority of improving export supply.
3. Page 2-2. Sacramento and El Dorado Counties are both part of the upper watershed of the Sacramento River Region.
4. Page 2-14. Another concern about conservation is that it can be divisive. Areas which were forced to conserve during this last low flow cycle were particularly rankled by a perceived lack of conservation by entities served by SWP. Any conservation program should be designed to avoid seeming inequities.
5. Page 2-34. The suggested methods of providing assurances includes constitutional and statutory changes. In that these methods could be used to negate water rights, they are not very assuring to upstream users. Any assurances program must include strong reaffirmation of the protections for areas of origin.
6. Page 2-37. The reliance on intrastate increases to water supply by the Colorado River Board's California 4.4 Plan seems to be a crucial driving force for the recommended alternatives. If this impact would fall mostly on MWD (page 2-38), how can the program assure that MWD will not seek increased delta exports to make up for the loss in Colorado River supply?
7. Page 6.1-11. The discussion of storage and conveyance needs a more thorough analysis of tailwater quality impacts and needs to address the potential for reduction in exports to meet outflow needs.

8. Page 6.1-16. The percentages seem to be misleading. If the 40% surplus is negligible during most dry seasons, The amount exported would seem to rise from 30% to 50% without any holdback for Delta restoration.
9. Page 6.1-17. The average 18% annual export is in conflict with the 30% export figure on the previous page. To clarify the numbers, the document needs to give the dry year, average, and wet year percentages.
10. Page 6.1-28. It is not clear whether the American River diversions have included consideration of the EBMUD allocations.
11. Page 6.1-63. The anticipated increased flows during low flow periods of 5-10% may not occur if the stored water quality does not meet agricultural needs and if upstream diversions are increased due to urban growth.
12. Page 6.2-22. The entire discussion on groundwater does not appear to make any distinction between shallow and deep aquifers. There are distinct separations between these sources. The poorer quality shallow groundwater may be recharged by the river hydraulics, but this may not recharge the deep groundwater. Discussion needs to be added as to how the clayey lenses separate the aquifers.
13. Page 6.2-29. The options available to the SWP and CVP service areas outside the Central Valley should also include fallowing marginal land and limiting urban growth.
14. Page 6.3-3. The increased salinization of agricultural lands in the Sacramento River basin is a real concern. Reducing applied water will increase the amount of residual salts in the soil and degradation of the agricultural productivity.
15. Page 7.1-28. The variables considered in reducing entrainment mortality must include reducing diversions which will reduce the reverse flow conditions which lead to the entrainment.
16. Page 7.1-29. The discussion on the mortality of juvenile chinook salmon needs to include the effects of reverse flows caused by the operation of SWP and CVP.
17. Page 7.2-20. SWP and CVP service areas outside the Central Valley are part of the historic habitat of the Swainson's hawk. Reducing urban growth pressures and fallowing marginal land could have a positive effect of restoring this habitat.
18. Page 8.1-10. The range of crops produced in semi-arid regions should be considered as a possible source of conservation.

WATER QUALITY PROGRAM

1. Page 10. The water quality program indicates that targets may not be met due to competing requirements or infeasibility. One area of feasibility that needs to be addressed in the document is the land disposal of toxins which are removed as part of the water quality program. If these toxins are removed from the water, or prevented from entering the water, they will either build up on the land, creating a toxic hazard, or require removal from the watershed.

DEVELOPING A STRATEGIC PLAN FOR ECOSYSTEM RESTORATION

1. Page 15. The strategic plan does not address the potential for restoration of areas served by SWP and CVP outside the Central Valley that could occur as a result of fallowing marginal land and decreasing urban growth pressures.

WATER USE EFFICIENCY COMPONENT

1. Page 1-3. The document would be greatly improved if the existing water budget were explained in terms of dry year usage, average year usage, and wet year usage. This would set the stage for describing the scope of the issues. In addition, the same budgets should be used to describe the No project alternative to provide the range of impacts from the increasing water demands of the beneficial users.

2. Page 4-8. While this page mentions the possibility of salt build up, the document does not address ways to reduce the build up to provide for continued high yields.

3. Page 4-19. The on-farm efficiency diagram does not seem to address the quality of the reduced tailwater being directed onto other farms. If this tailwater contains a greater concentration of salts and pesticides, the secondary user could be adversely impacted.

4. Page 4-20. Shallow groundwater basins may be linked directly to river water but this is not necessarily the case for deep aquifers. Since most users prefer the quality of the deep aquifers, imbalances and overdrafts may not be recharged by rivers in the immediate vicinity.

5. Page 5-51. The cost of enforced conservation during low flow years needs to be calculated. When water conservation is required, the O & M costs will remain constant or rise while the delivery amounts will be reduced.

6. Page 7-15. Local control and oversight of water transfers is a critical issue. Constitutional and statutory changes which remove this control are unacceptable. In addition, the CALFED program must be accompanied by a funding mechanism which assures that the local governments have the resources to implement fully CALFED's solution principle of "no redirected impacts."

7. Page A-8. This page discusses the export of another 1 million acre-feet of water from the Delta. Is this 1 million acre feet included in the estimated increased future demand?

EXECUTIVE SUMMARY

While the purpose of CALFED is to fix the Delta, it cannot be stressed too highly that Sacramento River in-basin users need adequate assurances that water they need for growth, environmental conservation, and agricultural productivity will not be exported by a legislative action. A more informative discussion of potential impacts of the CALFED program in source areas is needed, as is a detailed proposal for mitigation and assurances. The City looks forward to working with CALFED to develop a program which meets the needs of all persons affected by it.

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JUL 01 1998